

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

CAMP ENERGY, LTD.,

Debtor.

Case No. 22-50058-cag

Chapter 11

**DAVID N., CAMP, CAMP ENERGY,
LTD., CAMP ENERGY
MANAGEMENT, L.L.C., CAMP OIL
COMPANY, CAMP MINERALS, LLC,
WHITSETT ENERGY, LLC AND
KATHLEEN CAMP CASPER**

Plaintiffs,

Adv. No. 22-05007-cag

And

**LINDSAY G. CAMP AND TREVOR
CAMP,**

Intervening Plaintiffs,

v.

**J. BRADFORD CAMP AND LINDA P.
CAMP,**

Defendants/Third-Party Plaintiffs,

v.

**DAVID LACKEY, KATHLEEN CAMP
CASPER, AND KMRC LIMITED
PARTNERSHIP,**

Third-Party Defendants,

v.

JOHN E. WHITSETT,

Third-Party Defendant,

v.

**M. CYNTHIA CAMP, MICHELE
CAMP, AND ALLYSON CAMP,**

Third-Party Defendants.

**J. BRADFORD CAMP’S WITNESS AND EXHIBIT LIST FOR MARCH 9, 2022
HEARING ON J. BRADFORD CAMP’S MOTION TO DISMISS [DKT 29] AND J.
BRADFORD CAMP’S MOTION TO ABSTAIN AND REMAND [ADV DKT 13]**

Main Nos. 22-50058 Adv. No. 22-05007	Debtor: Camp Energy, Ltd.
Witnesses: <ul style="list-style-type: none"> • William Patterson • John Whitsett • John Chunn 	
Any witness called or designated by any other party for this Hearing	Judge: Honorable Craig A. Gargotta
Any rebuttal or impeachment witnesses, as necessary	Courtroom Deputy: Lisa Elizondo
Any person present in the courtroom	Hearing Date: March 9, 2022
Exhibits	Hearing Time: 9:00 a.m.
J. Bradford Camp submits the exhibits below and reserves the right to offer any exhibits submitted by any other party.	Party Name: J. Bradford Camp
Movant requests that this Court take judicial notice of its files and certain cited documents in the bankruptcy case 22-50058-cag and all related adversary proceedings. <i>See generally Aloe Creme Labs., Inc. v. Francine Co.</i> , 425 F.2d 1295, 1296 (5th Cir. 1970) (per curiam) (“The District Court clearly had the right to take notice of its own files and records and it had no duty to grind the same corn a second time. Once was sufficient.”).	Attorney’s Name: Michael W. O’Donnell and Lauren A. Valkenaar
	Attorney’s Phone: Michael W. O’Donnell (210) 224-5575 and Lauren A. Valkenaar (210) 469-3310
	Nature of Proceedings: J. Bradford Camp’s Motion to Dismiss [Dkt. 29] J. Bradford Camp’s Motion to Abstain and Remand [Adv. Dkt. 13]

EXHIBITS

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
1	2/25/22	n/a	J. Bradford Camp's Amended Notice of Fed. R. Civ. P. 30(b)(6) Deposition of Debtor Camp Energy, Ltd. Regarding Motion to Dismiss 22-50058 DKT. 0029						
2	1/1/07	n/a	Agreement of Limited Partnership of Camp Energy, Ltd. dated 10/25/2007 (HANNAH_023297-335)						
3	7/31/19	n/a	Email from J. Whitsett to Sarah Cassford (HANNAH_23527-32)						
4	9/12/19	n/a	Email from J. Whitsett to R. Hannah (HANNAH_019347-50)						
5	9/14/20	n/a	Email from R. Hannah to J. Whitsett (BDC026158-61)						
6	12/18/20	n/a	Email from J. Whitsett to J. Galindo (BDC027097-101)						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
7	1/20/22	n/a	Camp Energy Written Consent for Interim Manager (CEBK000168-72)						
8	2/1/22	19, pg. 21-37	Declaration of William R. Patterson in Support of Debtor's Application to Approve Terms of William R. Patterson's Service as Interim Manager with Exhibit 1 (Retention Agreement)						
9	1/22/22	n/a	Interim Manager Written Consent (CEBK000173-75)						
10	2/21/22	n/a	Memo from B. Patterson to Limited Partner Owners of Camp Energy, Ltd. (CEBK000332-36)						
11	8/7/20	n/a	J. Whitsett Texts with C. Trebes Sasser (BDC025902-04)						
12	8/24/20	n/a	Email from J. Whitsett to J. Galindo [WHITSETT-00046573-74]						
13	9/04/19	29-6	Camp Energy, Ltd. Certificate of Amendment Filing (CEBK000246-52)						
14	1/16/19	n/a	Minutes of Regular Meeting of Board of Directors of Camp Oil Company (BDC025690)						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
15	12/22/19	n/a	Minutes of Special Meeting of Board of Directors of Camp Oil Co. and Entities (CEBK000125)						
16	2/13/20	n/a	Minutes of Regular Meeting of Board of Directors of Camp Co. and Entities (CEBK000128-32)						
17	11/25/20	n/a	Regular Meeting of the Directors of Camp Oil Co. by Written Consent (CEBK000050-53)						
18	12/17/20	n/a	December 17, 2020 Camp Oil Co. Board Meeting Minutes (CEBK000037-48)						
19	7/12/21	n/a	Resolution of Board of Directors of Camp Oil Co. at Regular Board Meeting on July 12, 2021 (CEBK000012-18)						
20	9/8/21-1/3/22	n/a	2021-2022 Camp Oil Co. Board Meeting Minutes (CEBK000141-67)						
21	2/7/22	29-7	Documents reflecting Camp Oil Co. as the general partner of Camp Energy, Ltd. (BDC034502-3, HANNAH_007533-5) (same as Ex. 7 to Motion at Dkt. 29-7)						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
22	8/xx/20	n/a	Ramirena Camp Energy and Camp Oil folder (BDC034901-29)						
23	11/22/19	n/a	STEP – Opportunity Fund V, LLC Limited Liability Company Agreement Member Signature Page (WHITSETT-00032850)						
24	11/22/19	n/a	STEP – Opportunity Fund V, LLC Subscription Book (WHITSETT00032897-911)						
25	8/31/21	n/a	Summary of K-1 Schedules and K-1 Schedule for Camp Oil Company from Camp Energy, Ltd. 2020 Partnership Tax Return (BDC031337-42, 31475-90)						
26	2/3/22	23	Schedules, Statements, and Summary (cited in Motion as Adv. Dkt. 23)						
27	2/21/22	35	Amended Schedule and Statement						
28	1/22/22	1-1	Exhibit Financial Statements (cited in Motion as Adv. Dkt. 1-1 and ECF 1-1)						
29	2/21/22	36	Monthly Operating Report for Small Business Under Chapter 11						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
30	2/1/22	n/a	Camp Energy, Ltd. Balance Statement as of 2/1/22 from CEBK000010						
31	2/1/22	n/a	Camp Energy, Ltd. Profit & Loss Statement as of 2/1/22 from CEBK000010						
32	12/31/20	n/a	Camp Oil Co. Financial Report (BDC035684-701)						
33	9/29/21	n/a	Docket Control Order in Cause No. CVOP-19- 0000147						
34	3/23/21	n/a	Excerpts of Motion to Enter Protective Orders Hearing Transcript						
35	2/7/22	29-5	Excerpts of 1/12/2022 hearing transcript, pages 58-60 (same as Ex. 5 to Motion at Dkt. 29-5)						
36	6/22/21	n/a	Excerpts of Status Conference Hearing Transcript, pages 1-32, 55- 56						
37	6/9/21	n/a	J. Bradford Camp's Motion for Status Conference						
38	9/22/21	n/a	J. Bradford Camp's Amended Second Motion for Status Conference (with exhibits)						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
39	1/19/22	n/a	Letter from R. Valdez to M. O'Donnell, et al., regarding cancellation of J. Bradford Camp's deposition						
40	4/2/19	n/a	Plaintiffs' Original Petition in Bexar County, Texas Probate Court, Cause No. 2015-PC-4109						
41	4/29/19	n/a	Plaintiffs' Original Petition in Bandera County, Texas District Court, Cause No. CVOP-19-0000147						
42	4/30/19	n/a	Plaintiffs' Original Petition in Bexar County, Texas District Court, Cause No. 2019CI08691						
43	4/7/20	n/a	Plaintiffs' Notice of Non-Suit in Bexar County, Texas Probate Court, Cause No. 2015-PC-4109						
44	6/30/21	n/a	Original Petition for Declaratory Judgment and Application for Temporary Administration filed 6/30/21 in Bexar County, Texas Probate Court, Cause No. 2015-PC-4109						
45	12/4/20	n/a	Order on Defendants' Motion for Partial Summary Judgement on Plaintiffs' Option Claims						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
46	6/15/21	Adv. 13-6	Order on Defendants' Plea to the Jurisdiction filed 6/15/21 (Ex. 6 to Motion to Abstain and Remand)						
47	6/11/21	n/a	Order Denying John E. Whitsett's Motion for Partial Summary Judgment						
48	6/11/21	n/a	Order Denying Plaintiffs' Motion for Partial Summary Judgment on Void Testamentary Bequest of Camp Oil Company Stock and Interests in Camp Energy, Ltd. and Camp Minerals, LLC						
49	2/7/22	29-2	Plaintiff Camp Oil Company's Answers to Defendant J. Bradford Camp's Third Set of Interrogatories served 7/28/2021 (same as Ex. 2 to Motion at Dkt. 29-2)						
50	2/7/22	29-4	Order on Defendant J. Bradford Camp's Motion to Compel the Advancement of Attorneys' Fees and Expenses and for Partial Summary Judgment filed 1/12/2022 (same as Ex. 4 to Motion at Dkt. 29-4)						
51	1/15/22	n/a	Email from J.D. Pauerstein to J. Rudd (CEBK000377-8)						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
52	1/17/22	n/a	Letter from J. Whitsett to Camp Energy, Ltd. (CEBK000305)						
53	3/24/20	n/a	Notice of Special Meeting of the Directors of Camp Oil Co. Regarding Indemnification of J. Whitsett and Resolution (CEBK000135-40)						
54	10/12/18	n/a	Waiver of Notice of Regular Meeting of Bd. Of Directors of Camp Oil Co., Minutes, and Resolutions (WHITSETT-027085-103)						
55	9/21/18	n/a	Allied Party Agreement (WHITSETT-00038897-907)						
56	11/17/21	n/a	Hearing Transcript on Motion for Protective Order and Motions to Enlarge Deposition Time of J. Bradford Camp Transcript, pages . 83-85, 110, 115-116, and 121-122						
57	8/12/21	n/a	Email from Christine McEntyre to Counsel Regarding Motion for Substitution of Counsel						
58	3/4/20	n/a	Appeal from <i>U.S. v. Scully</i> , No. 16-51429 (5 th Cir. 2020)						

NO.	DATE	DKT	DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
59	12/21/21	n/a	Regular Meeting of the Directors of Camp Oil Company [CEBK000153-54]						
60	1/3/22	n/a	Minutes of Special Meeting of the Shareholders of Camp Oil Company						
61	2/7/22	28	List of Equity Security Holders						

DATED: March 4, 2022

Respectfully submitted,

By: /s/ Michael W. O'Donnell
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COUNSEL FOR J. BRADFORD CAMP

CERTIFICATE OF SERVICE

I certify that on the 4th day of March, 2022, a true and correct copy of the above and foregoing **J. BRADFORD CAMP'S WITNESS AND EXHIBIT LIST FOR MARCH 9, 2022 HEARING ON J. BRADFORD CAMP'S MOTION TO DISMISS [DKT 29]** was served via email to the email addresses for the parties noted on the attached service list.

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